

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

THIS DOCUMENT RELATES TO ALL
ACTIONS.

MDL. No. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris
Chief Mag. Judge Marianne B. Bowler

PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiffs, by their attorneys, respectfully move this Court for leave to file Appendix J to their Reply in Support of Plaintiffs' Motion to Compel the Supplementation of AstraZeneca's ("AZ") Privilege Logs or, in the Alternative, to Compel the Production of Inadequately Described Documents under seal.

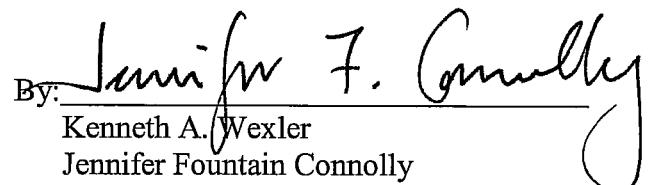
1. Pursuant to Paragraph 14 of the Protective Order (Dec. 13, 2002), the parties may designate documents "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL."
2. Appendix J is a chart reflecting deficient entries in AZ's four privilege logs, each of which have been marked HIGHLY CONFIDENTIAL by AZ. Although Plaintiffs do not believe that these charts contain anything deserving HIGHLY CONFIDENTIAL designation, in an abundance of caution and in compliance with the Protective Order, Plaintiffs are filing this chart under seal.

WHEREFORE plaintiffs respectfully request that this Court grant them leave to file Appendix J to their Reply in Support of Plaintiffs' Motion to Compel the Supplementation of AstraZeneca's ("AZ") Privilege Logs or, in the Alternative, to Compel the Production of Inadequately Described Documents under seal and all other relief that this Court deems just and proper.

Dated: August 15, 2005

Respectfully submitted,

By:


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CERTIFICATE OF SERVICE BY VERILAW

Docket No. MDL 1456

I, Jennifer Fountain Connolly, hereby certify that I am one of plaintiffs' attorneys and that, on August 15, 2005, I caused copies of Plaintiffs' Motion for Leave to File Under Seal to be served on all counsel of record by causing same to be posted electronically via Verilaw.

Jennifer F. Connolly
Jennifer Fountain Connolly